

April 3, 2023

Elizabeth Adams, Director  
Air and Radiation Division, Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street,  
San Francisco, California 94105  
[Adams.Elizabeth@epa.gov](mailto:Adams.Elizabeth@epa.gov)

Dear Director Adams:

The California Air Resources Board (CARB) is submitting final documentation for 2020 and 2021 exceptional events that occurred in the Yuba City-Marysville PM<sub>2.5</sub> nonattainment area in the Feather River Air Quality Management District (District). CARB requests that the U.S. Environmental Protection Agency (U.S. EPA) concur that the documents accompanying this request support the flagging of PM<sub>2.5</sub> exceedances in this area as natural or exceptional events due to smoke impacts from numerous wildfires that occurred in these years.

Unusually high PM<sub>2.5</sub> concentrations, exceeding the 2006 24-hour national ambient air quality standard of 35 µg/m<sup>3</sup> in Sutter and Yuba Counties were recorded in the summers and falls of 2020 and 2021, at the same time as these wildfires. The analyses and data presented in the enclosed documents for 2020 and 2021 demonstrate that without the impacts from wildfire smoke, the 2022 24-hour PM<sub>2.5</sub> design value for this area would have been below the standard.

The District held a 30-day public comment period as required by 40 CFR 50.14(c)(3)(v) that began on February 15, 2023 and was completed on March 17, 2023. The District received no comments.

On October 3, 2016, U.S. EPA revised the Treatment of Data Influenced by Exceptional Events Rule (Rule) that allows data to be flagged and excluded from consideration by U.S. EPA when making decisions related to the attainment status of an area (81 FR 68216). The District is submitting their second PM<sub>2.5</sub> Maintenance Plan (Plan) for the Yuba City-Marysville PM<sub>2.5</sub> nonattainment area. This Plan relies on exclusion of the affected data to show maintenance of the 24-hour PM<sub>2.5</sub> standard of 35 µg/m<sup>3</sup>. The Rule requires that states submit documentation to support the initial flagging to the appropriate U.S. EPA Regional Office. Representing the State of California, I am submitting this request to your office for consideration.

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If you have any questions regarding the enclosed documentation, please contact Sylvia Vanderspek, Chief, Air Quality Planning Branch, at (916) 324-7163 or via email at [sylvia.vanderspek@arb.ca.gov](mailto:sylvia.vanderspek@arb.ca.gov).

Sincerely,



Michael Benjamin, D. Env., Division Chief, Air Quality Planning and Science Division

Enclosures (2)

cc: With enclosure

Christopher Brown, Air Pollution Control Officer, Feather River Air Quality Management District  
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Sylvia Vanderspek, Branch Chief, Air Quality Planning Branch